

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

UNITED STATES OF AMERICA

1:23-cr-00254-MC

v.

SUPERSEDING INDICTMENT

NEGASI ISHAIAH ZUBERI aka
JUSTIN JOSHUA HYCHE,
Defendant.

18 U.S.C. § 1201(a)(1)
18 U.S.C. § 2421
18 U.S.C. § 922(g)(1)
18 U.S.C. § 751(a)

Forfeiture Allegations

THE GRAND JURY CHARGES:

COUNT 1
(Kidnapping)
(18 U.S.C. § 1201(a)(1))

From on or about July 14, 2023 to July 15, 2023, in the District of Oregon and elsewhere, defendant NEGASI ISHAIAH ZUBERI aka JUSTIN JOSHUA HYCHE did unlawfully and willfully seize, confine, decoy, kidnap, abduct, and carry away and hold Adult Victim 1 (AV1), and in committing and in furtherance of the commission of the offense, willfully transported AV1 across state lines, from the State of Washington to the State of Oregon, traveled in interstate

commerce, and used a means, facility, and instrumentality of interstate commerce, including a vehicle and a cell phone;

In violation of Title 18, United States Code, Section 1201(a)(1).

COUNT 2
(Transportation for Criminal Sexual Activity)
(18 U.S.C. § 2421)

From on or about July 14, 2023 to July 15, 2023, in the District of Oregon and elsewhere, defendant **NEGASI ISHAIAH ZUBERI aka JUSTIN JOSHUA HYCHE** knowingly transported AV1 in interstate commerce from the State of Washington to the State of Oregon with the intent that such individual engage in unlawful sexual activity for which any person can be charged with a criminal offense;

In violation of Title 18, United States Code, Section 2421.

COUNT 3
(Kidnapping)
(18 U.S.C. § 1201(a)(1))

On or about May 6, 2023, in the District of Oregon, defendant **NEGASI ISHAIAH ZUBERI aka JUSTIN JOSHUA HYCHE** did unlawfully and willfully seize, confine, decoy, kidnap, abduct, and carry away and hold Adult Victim 2 (AV2), and in committing and in furtherance of the commission of the offense, used a means, facility, and instrumentality of interstate commerce, including a vehicle, a cell phone, and an ATM;

In violation of Title 18, United States Code, Section 1201(a)(1).

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COUNT 4
(Felon in Possession of a Firearm and Ammunition)
(18 U.S.C. § 922(g)(1))

On or about July 15, 2023, in the District of Oregon, defendant **NEGASI ISHAIH ZUBERI aka JUSTIN JOSHUA HYCHE**, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically: assault with a deadly weapon, in the Superior Court of California, County of Alameda, Case Number 20-CR-013334, on or about January 21, 2021, did knowingly possess the following firearm and ammunition:

- An HS Produkt Springfield XDM 9x19mm pistol;
- Approximately 8 rounds of Blazer 9mm Luger ammunition;
- Approximately 4 rounds of Hornady 9mm Luger ammunition;
- Approximately 4 rounds of NovX 9mm Luger ammunition; and,
- Approximately 3 rounds of SIG 9mm Luger ammunition;

which had previously been shipped and transported in interstate and foreign commerce;

In violation of Title 18 United States Code, Section 922(g)(1).

COUNT 5
(Felon in Possession of a Firearm and Ammunition)
(18 U.S.C. § 922(g)(1))

On or about July 15, 2023, in the District of Oregon, defendant **NEGASI ISHAIH ZUBERI aka JUSTIN JOSHUA HYCHE**, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically: assault with a deadly weapon, in the Superior Court of California, County of Alameda, Case Number 20-CR-

013334, on or about January 21, 2021, did knowingly possess the following firearms and ammunition:

- A Remington Arms Company, Model 783, .308 Winchester caliber rifle;
- An Anderson Manufacturing, Model AM-15, multi-caliber rifle;
- An E.R. Amantino (Stoeger), Model Condor Competition, 12 gauge shotgun;
- Approximately 27 rounds of Lake City Arsenal 5.56 ammunition;
- Approximately 27 rounds of Blazer 9mm Luger ammunition;
- Two rounds of Remington Arms 9mm Luger ammunition;
- One round of Hornady 9mm Luger ammunition;
- Approximately 16 rounds of NovX 9mm Luger ammunition;
- Approximately 17 rounds of SIG 9mm Luger ammunition;
- One Federal 12 gauge shotgun shell; and,
- One Winchester 12 gauge shotgun shell;

which had previously been shipped and transported in interstate commerce;

In violation of Title 18 United States Code, Section 922(g)(1).

COUNT 6
(Felon in Possession of Ammunition)
(18 U.S.C. § 922(g)(1))

On or about July 15, 2023, in the District of Oregon, defendant **NEGASI ISHAIAH ZUBERI aka JUSTIN JOSHUA HYCHE**, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically: assault with a deadly weapon, in the Superior Court of California, County of Alameda, Case Number 20-CR-013334, on or about January 21, 2021, did knowingly possess the following ammunition:

- Approximately 410 rounds of Lake City Arsenal 5.56 ammunition;
- One round of Hornady 6mm ARC ammunition;
- One round of Tula Cartridge Works 7.62x39 ammunition;
- Approximately 4 Federal 12 gauge shotgun shells; and,
- Approximately 14 Winchester 12 gauge shotgun shells;

which had previously been shipped and transported in interstate and foreign commerce;

In violation of Title 18 United States Code, Section 922(g)(1).

COUNT 7
(Felon in Possession of Ammunition)
(18 U.S.C. § 922(g)(1))

On or about July 15, 2023, in the District of Oregon, defendant **NEGASI ISHAIAH ZUBERI aka JUSTIN JOSHUA HYCHE**, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, specifically: assault with a deadly weapon, in the Superior Court of California, County of Alameda, Case Number 20-CR-013334, on or about January 21, 2021, did knowingly possess the following ammunition:

- Approximately 79 rounds of Tula Cartridge Works 7.62x39 ammunition;
- Approximately 246 rounds of Remington Arms 9mm Luger ammunition;
- Approximately 8 rounds of Blazer 9mm Luger ammunition; and,
- Approximately 30 rounds of Hornady 6mm ARC ammunition;

which had previously been shipped and transported in interstate and foreign commerce;

In violation of Title 18 United States Code, Section 922(g)(1).

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COUNT 8
(Attempted Escape)
(18 U.S.C. § 751(a))

On or about August 22, 2023, in the District of Oregon, defendant **NEGASI ISHAIH ZUBERI aka JUSTIN JOSHUA HYCHE** did attempt to escape from the custody of the Jackson County Jail, an institutional facility in which he was lawfully confined by process issued under the laws of the United States by any court, judge, and magistrate judge, namely an Order of Detention issued by the United States District Court for the District of Oregon after arrest and arraignment on felony charges in case number 1:23-cr-00254-MC;

In violation of Title 18, United States Code, Section 751(a).

FIRST FORFEITURE ALLEGATION

Upon conviction of the offense in Count 2 of this Superseding Indictment, defendant **NEGASI ISHAIH ZUBERI aka JUSTIN JOSHUA HYCHE** shall forfeit to the United States pursuant to 18 U.S.C. § 2428, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation.

SECOND FORFEITURE ALLEGATION

Upon conviction of the offenses in Counts 4, 5, 6, or 7 of this Superseding Indictment, defendant **NEGASI ISHAIH ZUBERI aka JUSTIN JOSHUA HYCHE** shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of the offenses.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

Dated: February 15, 2024

A TRUE BILL.



Presented by:

NATALIE K. WIGHT
United States Attorney



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